# EXHIBIT 2

From: Park, Ryuk <RPark@winston.com>
Sent: Friday, September 8, 2023 5:25 PM

**To:** Zhao, Yanan; Winston-Micron-Netlist; andrea@wsfirm.com; ce@wsfirm.com; Wesley Hill

**Cc:** #Netlist-Micron [Int]; Jennifer Truelove (jtruelove@McKoolSmith.com)

Subject: RE: Netlist v. Micron, No. 22-cv-203 (EDTX) | meet and confer

Yanan,

## 1. Netlist's proposal to extend deadline for damages report and HBM-related expert report by 2 weeks

- 1. Micron does not believe there is enough time in the schedule for a 2-week extension to opening reports.
- 2. Micron proposes extending all expert related deadlines for both sides by 3 days instead.

## 2. ESI for Mr. Beal and Mr. Royer

1. Due to Nest's extremely late ESI requests and unreasonable breadth of search terms, we anticipate completing review of Mr. Royer's emails by Monday-Tuesday timeframe, and Mr. Beal's emails by Tuesday-Wednesday next week. We will produce emails as soon as review is completed.

#### 3. License agreement

1. The additional license agreements are being processed for production. We expect our discovery vendor to have the production ready by Monday.

## 4. Product samples

1. We will provide updates on the ETA for samples by end of next week.

## 5. Source code materials

- 1. Remaining source code printouts, including printouts of documents made available yesterday, were sent out earlier today.
- 2. Our discovery vendor is processing the redacted documents.

## 6. Netlist's proposed use of Renesas deposition transcript from the Netlist/Samsung case

1. We are still reviewing and provide Micron's response on Monday.

Ryuk

## Ryuk Park

Of Counsel

Winston & Strawn LLP T: +1 650-858-6500 D: +1 650-858-6440 M: +1 607-242-9789

F: +1 650-858-6550 winston.com



From: Zhao, Yanan <yzhao@irell.com>
Sent: Friday, September 8, 2023 2:06 PM

**To:** Park, Ryuk <RPark@winston.com>; Winston-Micron-Netlist <Winston-Micron-Netlist@winston.com>; andrea@wsfirm.com; ce@wsfirm.com; Wesley Hill <wh@wsfirm.com>

Cc: #Netlist-Micron [Int] <Netlist-Micron@irell.com>; Jennifer Truelove (jtruelove@McKoolSmith.com) <jtruelove@McKoolSmith.com>

Subject: RE: Netlist v. Micron, No. 22-cv-203 (EDTX) | meet and confer

That's fine with us. Can Micron also let us know your position today at least with respect to: (1) Netlist's motion to extend the expert reports deadline and (2) Renesas deposition designations?

Best,

## Yanan Zhao

**Associate** 

IRELL & MANELLA LLP 1800 Avenue of the Stars, Suite 900

Los Angeles, CA 90067

DID: 310-277-1010 | <u>yzhao@irell.com</u>

From: Park, Ryuk < <a href="mailto:RPark@winston.com">RPark, Ryuk < a href="mailto:RPark, Ryuk < a h

**To:** Zhao, Yanan <<u>yzhao@irell.com</u>>; Winston-Micron-Netlist <<u>Winston-Micron-Netlist@winston.com</u>>; <u>andrea@wsfirm.com</u>; <u>ce@wsfirm.com</u>; <u>Wesley Hill <<u>wh@wsfirm.com</u>></u>

Cc: #Netlist-Micron [Int] < Netlist-Micron@irell.com >; Jennifer Truelove (jtruelove@McKoolSmith.com) < jtruelove@McKoolSmith.com >

Subject: RE: Netlist v. Micron, No. 22-cv-203 (EDTX) | meet and confer

Yanan,

We can exchange the 30(b)(6) designations today at 6 pm PT. Let us know if that works for Netlist.

Thanks,

Ryuk

## Ryuk Park

Of Counsel

Winston & Strawn LLP T: +1 650-858-6500 D: +1 650-858-6440 M: +1 607-242-9789

F: +1 650-858-6550

winston.com



From: Zhao, Yanan <<u>yzhao@irell.com</u>>
Sent: Friday, September 8, 2023 1:38 PM

To: Winston-Micron-Netlist < <u>Winston-Micron-Netlist@winston.com</u>>; <u>andrea@wsfirm.com</u>; <u>ce@wsfirm.com</u>; Wesley Hill < <u>wh@wsfirm.com</u>> Cc: #Netlist-Micron [Int] < <u>Netlist-Micron@irell.com</u>>; Jennifer Truelove (<u>jtruelove@McKoolSmith.com</u>) < <u>jtruelove@McKoolSmith.com</u>>

Subject: RE: Netlist v. Micron, No. 22-cv-203 (EDTX) | meet and confer

Counsel, following up on the email below. Please also let us know if the parties can exchange the 30(b)(6) designations 4pm PT/6pm CT today.

Best, Yanan

## **Yanan Zhao**

Associate

IRELL & MANELLA LLP 1800 Avenue of the Stars, Suite 900 Los Angeles, CA 90067

DID: 310-277-1010 | <u>yzhao@irell.com</u>

From: Zhao, Yanan

Sent: Wednesday, September 6, 2023 8:25 PM

To: Winston-Micron-Netlist < <u>Winston-Micron-Netlist@winston.com</u> >; <u>andrea@wsfirm.com</u>; <u>ce@wsfirm.com</u>; Wesley Hill < <u>wh@wsfirm.com</u> > Cc: #Netlist-Micron [Int] < <u>Netlist-Micron@irell.com</u> >; Jennifer Truelove (<u>itruelove@McKoolSmith.com</u>) < <u>itruelove@McKoolSmith.com</u> > Subject: Netlist v. Micron, No. 22-cv-203 (EDTX) | meet and confer

Counsel, thanks for your time meeting and conferring with us today. Below is a summary of the parties' discussions as well as Netlist's proposals regarding dropping some of the noticed witnesses. Some are explained in more detail in Tom's separate emails.

- 1. Micron will provide the designation of Netlist's outstanding 30(b)(6) topics, including topics 90-116, on Friday. Netlist agrees to provide the same for the remaining witnesses and Micron's topics on Friday.
- 2. Micron will confirm by this week whether it agrees to Netlist's motion to extend the deadline for Netlist to serve expert technical reports relating to HBM products and damages report for 2 weeks.
- 3. ESI for Beal/Royer: Micron agrees to produce by the end of this week, and will let us know ahead if that is impractical.
- 4. License agreements: Micron will produce them in the next few days.
- 5. Supplier information and correlation: Micron will provide supplemental responses and information of purchase records from its suppliers on a rolling basis.



## Case 2:22-cv-00203-JRG-RSP Document 199-3 Filed 09/27/23 Page 4 of 4 PageID #: 9641



(5) The above-referenced compromise is based on the understanding that Micron does not intend to bring any of these witnesses to trial, designate them as 30(b)(6) corporate representatives, or have Micron experts rely on their input.

Best, Yanan

## **Yanan Zhao**

**Associate** 

IRELL & MANELLA LLP 1800 Avenue of the Stars, Suite 900 Los Angeles, CA 90067 DID: 310-277-1010 | <a href="mailto:yzhao@irell.com">yzhao@irell.com</a>

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